

Division of Gaming Enforcement Know Your Customer (KYC) Requirements

Account Creation (Accuracy of Data) – Require the following data fields to be authenticated using multi-source authentication prior to any patron deposit or other patron initiated activity:

Require an exact match:

1. Date of Birth (MM/DD/YYYY)
2. SSN (Full nine digits fully entered or obtained from last four)
3. Last name

Permit flexible match (Bob or Robert would pass, as would abbreviations used in the address fields):

4. First name
5. Address (Street Address including number, City, State and Zip Code – PO Box is not acceptable)

Account Creation (Authentication) – Require reasonable measures to ensure that the person creating the account is who they say they are prior to any patron deposit or other patron initiated activity. Any of the measures described below are acceptable:

1. Answering three knowledge-based questions
2. Verification of device ID and phone number matched with the patron's KYC data
3. Government issued ID
4. Other method approved by the Division

Manual KYC – Requirements to address manual KYC data entry:

1. Require multi-source authentication of all KYC fields following the re-entry or modification of any required KYC data field. Multi-source authentication of all fields must be the last step prior to account creation.
2. Require the casino IGM or racetrack compliance manager to receive a weekly log from their Internet gaming partner documenting instances where patron accounts were created using manually verified data that could not pass multi-source authentication.
3. Require DGE notice via Incident Report, submitted by the casino IGM or racetrack compliance manager or their designee, when making changes to a customer's SSN and/or DOB once an account has been created.

Deceased – Require the system to recognize and block attempts to create an account using the KYC data of a deceased person. Require a fraud form be filed with the DGE whenever this occurs.

Change Controls – Establish responsibility for KYC compliance:

1. KYC internal controls shall detail the procedures used to ensure compliance with DGE KYC requirements and applicable Federal Law.
2. KYC internal controls must be approved by the casino licensee's IGM and AML compliance manager or for racetracks, their compliance manager, prior to implementation.
3. Initial KYC internal controls and subsequent changes shall be filed by the casino licensee's IGM or for racetracks, their compliance manager, via Notify and Do Release Notes prior to implementation.